## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EDUARDO ROSARIO,

Plaintiff,

Civil Action No. 2:20-cv-02966

 $\mathbf{v}$ .

ALEX TORRES PRODUCTIONS, INC., et al.

Defendants.

## DECLARATION OF LORI CRUSSELLE IN SUPPORT OF PLAINTIFF'S RESPONSE TO ORDER TO SHOW CAUSE

NOW COMES the Declarant, Lori Crusselle, and states:

- I am a senior litigation paralegal for the Law Office of Keith Altman.
- 2. On October 25, 2021, at 10:14 p.m., I received an email from Keith Altman indicating that his Response to the Order to Show Cause could not be filed. This email (see attached herein) was also sent to opposing counsel and chambersofjudgerobreno@paed.uscourts.gov.

- 3. When I logged onto my computer early on the morning of October 26, 2021, I again, at the direction of Mr. Altman, attempted to file the document. I was unable because Mr. Altman's PACER login credentials do not permit filing in this Court.
- 4. At 11:18 a.m. on October 26, 2021, I attempted to call the Clerk of the Court at (215) 597-7704. The Clerk's message indicated that all staff was working remotely but to leave a message with an email address for the clerk to return my message. I left the case number and my email address, loricrusselle@kaltmanlaw.com. I have not received any response to this call.
- 5. At 12:04 p.m. on October 26, 2021, I emailed Mr. Altman's
  Response to the Order to Show Cause to
  PAED\_documents@paed.uscourts.gov. See attached email.
  This email address is provided on the Court's website as an avenue to submit documents if electronic filing difficulties arise. I received no response to this email.

Having not received any response to my attempts to contact the Court on October 26, 2021, I again, on October 29, 2021,

emailed PAED\_documents@paed.uscourts.gov with Mr.

Altman's Response to the Order to Show Cause. See

attached email. Again, I received no reply.

7. Since October 29, 2021, I have made additional attempts to

use the PACER system for this Court. I have been unable to

successfully connect with PACER for this jurisdiction since

October 26, 2021.

6.

Executed on November 11, 2021

/s/ Lori Crusselle Lori Crusselle

Re: Rosario. 2:2020=cv-09266

Lori Crusselle <loricrusselle@kaltmanlaw.com>

Fri 10/29/2021 11:56 AM

To: PAED\_documents@paed.uscourts.gov < PAED\_documents@paed.uscourts.gov >

Cc: Toni Renee Vierra <trvierra@kaltmanlaw.com>; Keith Altman <keithaltman@kaltmanlaw.com>

Please confirm that this document will be filed. We sent you the document on Tuesday morning after not being able to file in your e-filing system.

Thank you.

Lori Crusselle Litigation Paralegal Law Office of Keith Altman

From: Lori Crusselle < loricrusselle@kaltmanlaw.com>

Sent: Tuesday, October 26, 2021 10:04 AM

To: PAED\_documents@paed.uscourts.gov <PAED\_documents@paed.uscourts.gov>

Cc: Toni Renee Vierra <trvierra@kaltmanlaw.com>; Keith Altman <keithaltman@kaltmanlaw.com>

Subject: Fw: Rosario. 2:2020=cv-09266

Please see Mr. Altman's email to Judge Robreno yesterday evening. Unfortunately, we are unable to file this document via the ECF/CM website, even though Mr. Altman is connected to NextGen. If you will please file this document at your earliest opportunity, we would be extremely grateful.

Respectfully,

Lori Crusselle Litigation Paralegal to Keith Altman loricrusselle@kaltmanlaw.com Law Office of Keith Altman

From: Keith Altman < keithaltman@kaltmanlaw.com >

Sent: Monday, October 25, 2021 8:14 PM

**To:** ChambersofJudgeRobreno@paed.uscourts.gov < ChambersofJudgeRobreno@paed.uscourts.gov >

Cc: john griffin <jakegriffinlaw@gmail.com>; Lori Crusselle <loricrusselle@kaltmanlaw.com>; SD

<sd@kaltmanlaw.com>

**Subject:** Rosario. 2:2020=cv-09266

Your Honor,

I write this with a great deal of difficulty as I have suffered a catstrophic loss of most of my useful vison last weekend.

I attempted to file our response to your Honor's OSC but had technical difficulties. I have attached it as evidence that it was completed as ordered and I will have one of my staff try to file or reach out to the help desk in the morning to see that it is filed.

I apologize for not being able to file though ECF tonight.

Respectfully,

Keith Altman

Keith Altman
The Law Office of Keith Altman
516-456-5885
<a href="mailto:keithaltman@kaltmanlaw.com">keithaltman@kaltmanlaw.com</a>
Licensed in California and Michigan